

Federal Defenders OF NEW YORK, INC.

Eastern District
16 Court Street-3rd Floor, Brooklyn, NY 11241
Tel: (718) 330-1200 Fax: (718) 855-0760

Leonard F. Joy
Executive Director and
Attorney-in-Chief

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U.S. DISTRICT COURT E.D.N.Y.

Eastern District
Peter Kirchheimer
Attorney-in-Charge

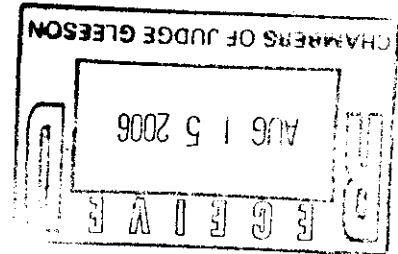
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August 14, 2006 **BROOKLYN OFFICE**

BY FAX

The Honorable John Gleeson
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

granted
Sordani
s/John Gleeson
W
8-21-06



RE: U.S.A. v. Richard Surprise, 05 CR 605

Your Honor:

I write to ask the Court to modify the bail restrictions of my client, Richard Surprise, who is awaiting sentencing. This modification will permit him to pursue more employment options. Neither the government nor Pretrial Services has any objection to this request.

Mr. Surprise is currently geographically restricted to the E.D.N.Y. **We respectfully request that his restrictions be expanded to include the continental United States.**

Thank You for Your continued attention to this matter.

Respectfully Submitted,

[Signature]
JAN A. ROSTAL, ESQ.
Staff Attorney
(718) 330-1207

JAR/jar

cc: Cameron Elliot, Esq.
Assistant United States Attorney
Mr. Richard Surprise
Pretrial Services